

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

SSGT. JASON A. ADKINS, USAF,)	C.A. NO.: 04-1453
)	
Plaintiff,)	
)	
v.)	REPLY TO PLAINTIFF'S
)	ANSWERING BRIEF IN
DONALD H. RUMSFELD, Secretary of Defense;)	OPPOSITION TO
JAMES G. ROCHE, Secretary of the Air Force;)	DEFENDANTS' MOTION
GEN. JOHN W. HANDY, Commander Air Mobility))	TO DISMISS AND
Command; COL. JOHN I. PRAY, JR., 436th Air)	DEFENDANTS' ANSWERING
Wing Commander, in their official capacities,)	BRIEF IN OPPOSITION TO
)	PLAINTIFF'S MOTION
Defendants.)	TO STRIKE

EXHIBIT 2:

AFFIDAVIT OF RONALD J. MAHONEY

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SSGT JASON A. ADKINS, USAF,)	C.A. NO.: 04-1453-JJF
)	
Plaintiff,)	
)	
v.)	
)	
DONALD H. RUMSFELD, Secretary of Defense;)	
JAMES G. ROCHE, Secretary of the Air Force;)	
GEN JOHN W. HANDY, Commander Air Mobility)	
Wing; COL JOHN I. PRAY, JR., 436th Air Wing)	
Commander, in their official capacities,)	
)	
Defendants.)	

AFFIDAVIT OF RONALD J. MAHONEY


I, Ronald J. Mahoney, state under penalty of perjury the following:

1. I am a Senior Master Sergeant in the United States Air Force. I am currently stationed at Dover Air Force Base where I serve as the Flight Engineer Superintendent in the Third Airlift Squadron, a component of the 436th Airlift Wing. In that capacity, I am responsible for the leadership and management of approximately thirty flight engineers. I have served in that capacity since August 2004. Prior to that time, I served as Assistant Flight Superintendent Engineer at Dover and McGuire Air Force Bases.
2. At the time of the events described in plaintiff's Amended Complaint, Jason Adkins served as a Staff Sergeant in the Third Airlift Squadron under my supervision. On January 9, 2006, I submitted a detailed

affidavit explaining the circumstances resulting in my issuance of a letter of reprimand to SSgt Adkins on October 22, 2004.

3. Upon learning that SSgt Adkins had referred the matter to the 436th Air Wing Inspector General (IG) on October 27, 2004, I chose not to place the letter of reprimand and/or SSgt Adkins' written response in SSgt Adkins' official Personnel Information File (PIF).
4. From October 27, 2004, until April 18, 2004, I preserved the original letter of reprimand and SSgt Adkins' written response in my office without further action. Upon request, I provided these original documents to the 436th Air Wing Legal Office at Dover AFB on April 18, 2006.

Dated: April 26, 2006



Ronald J. Mahoney, SMSgt, USAF